

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

GE HFS HOLDINGS, INC., f/k/a )  
HELLER HEALTHCARE FINANCE, )  
INC., )

Plaintiff, )

And )

MICHAEL INGOLDSBY, )

Intervenor/Plaintiff, )

v. )

Civil Action No. 05-CV-11128-NG

NATIONAL UNION FIRE )  
INSURANCE COMPANY OF )  
PITTSBURGH, PA., and )  
INTERNATIONAL INSURANCE )  
GROUP, LTD., )

Defendants. )

**DEFENDANT NATIONAL UNION FIRE INSURANCE COMPANY OF  
PITTSBURGH, PA.'S MOTION FOR SUMMARY JUDGMENT  
AGAINST INTERVENOR-PLAINTIFF MICHAEL INGOLDSBY**

Defendant National Union Fire Insurance Company of Pittsburgh, PA ("National Union") submits this Motion for Summary Judgment with respect to the claims asserted by Intervenor-Plaintiff Michael Ingoldsby ("Mr. Ingoldsby") in his First Amended Complaint in Intervention (the "Intervenor Complaint").

For the reasons set forth in the Memorandum of Law filed herewith, this Court should grant National Union's Motion for Summary Judgment.

NATIONAL UNION FIRE INSURANCE  
COMPANY OF PITTSBURGH, PA

By its attorneys,

Dated: November 9, 2006

/s/ Joey H. Lee  
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Joey H. Lee (BBO# 663803)  
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**CERTIFICATE OF SERVICE**

I, Joey H. Lee, hereby certify that on this 9<sup>th</sup> day of November, 2006, I served a copy of the foregoing Motion for Summary Judgment via ECF on Gregory J. Aceto, Johnson & Aceto, P.C., 67 Batterymarch Street, Suite 400, Boston, MA 02110 and Richard E. Heifetz, Tucker, Heifetz & Saltzman, LLP, Three School Street, Boston, MA 02108.

/s/ Joey H. Lee  
Joey H. Lee